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28 *Attorneys for Defendants*
29 *Jeff Moss and DEF CON Communications, Inc.*

30 **UNITED STATES DISTRICT COURT**

31 **DISTRICT OF NEVADA**

32 CHRISTOPHER J. HADNAGY, an individual;
33 and SOCIAL-ENGINEER, LLC, a
34 Pennsylvania limited liability company,

35 Case No.: 2:23-cv-01345

36 Plaintiffs,

37 **STIPULATION FOR EXTENSION OF**
38 **TIME TO RESPOND TO**
39 **COMPLAINT**

40 v.

41 **(First Request)**

42 JEFF MOSS, an individual; DEF CON
43 COMMUNICATIONS, INC., a Washington
44 corporation; and DOES 1-10; and ROE
45 ENTITIES 1-10, inclusive,

46 Defendants.

47 Pursuant to LR II 7.1 and LR IA 6-1, Plaintiffs Christopher Hadnagy and Social-Engineer
48 LLC (“Plaintiffs”) by and through their counsel of record, Riklis Law, PLLC and Defendants

1 Jeff Moss and Def Con Communications (“Defendants”) by and through their counsel of record,
2 Holland & Hart, LLP, hereby stipulate as follows:

3 1. Plaintiff filed its Complaint in the Eighth Judicial District Court in and for Clark
4 County, Nevada, Case No. A-23-875618-C on August 9, 2023. *See* ECF No. 1.

5 2. Defendants were served with the Complaint on August 10, 2023.

6 3. Defendants filed their Notice of Removal on Tuesday, August 29, 2023. ECF No.
7 1. Accordingly, pursuant to FRCP 81, Defendants’ deadline to file a response to the Complaint
8 is Tuesday, September 5, 2023.

9 4. The parties agree to an extension from Tuesday, September 5, 2023 until Monday,
10 October 2, 2023, for Defendants to respond to Plaintiffs’ Complaint.

11 5. The stipulated extension is necessary to accommodate previously scheduled
12 travel for several members of Defendants’ case team and to provide adequate time for counsel
13 to analyze the Complaint and prepare Defendants’ response thereto.

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6. This is the parties' first request for an extension to respond to the Complaint. This stipulated extension is made in good faith and not for purposes of delay.

DATED this 1st day of September 2023.

DATED this 1st day of September 2023.

HOLLAND & HART LLP

RIKLIS LAW, PLLC

/s/ Robert J. Cassity

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ORDER

IT IS SO ORDERED

DATED: 3:55 pm, September 05, 2023

Berlwekse

**BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE**

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